Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

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Amendment of Section 97.111 (b)(5)(6) Authorized transmissions. Proposed elimination of one-way transmissions such as code practice and information bulletins on the amateur radio bands below 30 MHz, including those from W1AW.	))))))))	RM-8626

I have been active as an American Radio Relay League Official Bulletin Station in the past. I should be qualified to provide input in this finding. At one time I was "flamed" on Packet Radio for not using the BID and other correct formatting. I believe I know as much as I can know on relaying ARRL Bulletins based on past experience.

For a period of time, within the past two years, the Packet Radio BBSs in eastern Nebraska and western Iowa, for certain, were not receiving ARRL Bulletins regularly as should be expected. I was finding more current Bulletins off of W1AW on shortwave. As I remember, there were a number of ARRL Bulletins which never made it on Packet Radio to this part of the world until I began to input Bulletins. The interfacing situation is better now as long as not too many links break down in the network. There is generally no way for anyone to tell when that happens unless messages are lost in the ARRL Bulletin number sequencing. Some BBSs have Bulletin traps and they could give you a documented history. I recall the W0AK BBS in Des Moines, Iowa, has such a Bulletin trap.

I remember at one time this region's only ARRL Bulletin feed was from Kansas City, Missouri. If the BBS SYSOP in Saint Joseph, Missouri, made a pilot error, no ARRL messages headed our way. I know that first hand from the N9HVT [now KG0SE] BBS SYSOP, Marion. Much of the packet forwarding has been and to some extent is still, as far as I know, via terrestrial links subject to "meltdown" when the bands are up (frequently during the summer months, thanks to temperature inversions) and amateur radio growing pains effecting congestion creates retries and disconnects. Not always a 100% reliable way of sending messages.

I understand the Gopher Network, around Omaha, Nebraska, is now being supplemented by a telephone "worm hole." A "worm hole" is not helpful if and when the telephone system is down, which sometimes, although rarely, happens. I would hope amateur radio can back up emergency telephone

communications in a worst case scenario.

As you can surmise, W1AW shortwave Bulletins are ESSENTIAL for we amateurs in the hinterlands of America along with backup for those in more populated areas. If Packet Radio is going to rely on telephone "worm holes," that advantage will vanish if and when a vital telephone link is severed. Redundancy of links is paramount as shortwave fills in coverage outside of W1AW's direct wave on VHF/UHF/SHF.

I learned my 20 words per minute International Morse Code through copying W1AW code transmissions and Bulletins. Not all citizens are affluent enough to have a computer and software to learn the code. I currently can not afford to upgrade from my Commodore C-64C to a IBM or IBM clone due to alleged employment blacklisting by insurance companies because of health problems (probable chronic liver disease). I do not know many amateurs who can afford Internet access either. Why should the poor among us, who might have a lot of free time on our hands, be deprived the volunteer national service amateur radio is privileged to provide? It is outrageous to imply one has to belong to the middle or upper social strata in order to be an amateur radio operator.

I have no problems with W1AW Bulletin content. As far as I know, the ARRL Bulletins are broken down into six or seven categories. That way, whatever one's interest and fancy is in amateur radio, one can read only what is applicable to the amateur. I do not see it at all helpful for the Commission to begin de facto editorial censorship of ARRL Bulletins. As long as the ARRL and others do not advocate sedition, I think the ARRL and others should have a free hand on what non-commercial information to broadcast to the amateur radio community.

In the event the Commission wishes to fine tune amateur radio wide area origin shortwave Bulletin sending, I have several technical based suggestions to bring forward. The first is to require high-angle radiation antennas on 40 meters to 10 meters for wide area origin shortwave Bulletin transmissions. A lazy quad with a tuned reflector should be ideal.

Second, allow master/slave shortwave amateur radio wide area origin Bulletin stations which are synchronized as to frequency, using high-angle antennas on 40 to 10 meters. The Continental Divide in the state of Colorado would be an ideal location for a W1AW slave station.

Third, authorize wide area origin shortwave Bulletin channels outside the international amateur radio bands using high-angle antennas. The channels could be time shared by other amateur radio one-way users other than the ARRL to provide diversity of ideas and information.

Fourth, increase wide area origin shortwave Bulletin stations to maybe 10 kW output power.

Fifth, require data transmissions of RTTY, AMTOR, and ASCII on shortwave to be sent a minimum of three times either singly or in total. I rarely could get a solid copy of W1AW on one data transmission. W1AW phone transmissions are normally impossible for me to hear at my location. Code works pretty good but it is time consuming.

Sixth, require the data wide area origin shortwave Bulletin stations to be crystal controlled or use Automatic Frequency Control. It used to really chill me when I copied W1AW data and had to retune my PLL receiver the first ten minutes. I experimented with my system here and I came to the conclusion, W1AW transmitters were being turned on cold as there was NO further drifting after ten minutes.

There is some merit to what W5YI says about W1AW, however, I do not think overall, RM-8626 is in the long term interest of amateur radio. I know it would be a disaster for me to not have shortwave W1AW transmissions to be able to copy real time during emergencies and any time sensitive information. Many Packet Radio Bulletins take at least a day or can take many days, if ever, to get here. It is a big worry on what percentage of Packet Radio messages get lost forever.

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